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7 *Wal-Mart Stores, Inc.*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

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11 LUCINDA CRAIG,
12 Plaintiff,

13 vs.

14 WAL-MART STORES, INC.; DOES 1-20 and
ROE BUSINESS ENTITIES 1-20, inclusive,
15 Defendants.
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2:16-cv-01020-JCM-PAL

STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES

[Third Request]

17 COME NOW, Plaintiff Lucinda Craig (hereinafter "Plaintiff"), by and through her counsel of
18 record, Bryan Blackwell, Esq. of Richard Harris Law Firm, and Defendant Wal-Mart Stores, Inc. ("Wal-
19 Mart"), by and through its counsel of record, Ryan Kerbow, Esq. of the law firm of Phillips, Spallas &
20 Angstadt, LLC, and hereby stipulate to modify the scheduling order. Pursuant to Local Rule 6-1(b), the
21 parties state that this is their third request for such leave.

22 **DISCOVERY COMPLETED TO DATE**

- 23 • The parties have exchanged initial disclosures of documents and the names of individuals with
24 knowledge of the facts pertaining to the claims set forth in this matter.
- 25 • Wal-Mart responded to Plaintiff's propounded written discovery requests, including
26 Interrogatories and Requests for Production of Documents to Defendant.
- 27 • Wal-Mart propounded a First Set of Interrogatories and First Set of Requests for Production of
28 Documents. Plaintiff has served responses.

- Plaintiff has been deposed.
- Plaintiff underwent an FRCP 35 Examination by Wal-Mart's retained expert physician.
- Plaintiff has served her initial expert disclosures.
- Defense has served its initial expert disclosures.
- Defense has served rebuttal expert disclosures.
- Plaintiff has deposed Walmart's Rule 30(b)(6) representative.
- Walmart has deposed Plaintiff's retained expert witnesses.
- Walmart has deposed certain of Plaintiff's treating physicians.
- Plaintiff has deposed Walmart's retained expert, Dr. Ewers.
- The parties have deposed fact witness, Daria Lee.

REASONS FOR EXTENSION TO COMPLETE DISCOVERY

The parties aver, pursuant to Local Rule 6-1(b), good cause exists for a 30-day extension of discovery deadlines. As a result of Wal-Mart's motion for Rule 37(c) sanctions [ECF No. 15], the Court ordered that Wal-Mart may disclose additional affirmative expert opinions by June 15, 2017. However, because – unbeknownst to Wal-Mart – certain key medical imaging files pertaining to Plaintiff's claimed injuries that Wal-Mart obtained through discovery were corrupted and unviewable, a fact Wal-Mart learned of only recently from Wal-Mart's medical expert, Wal-Mart is having to re-order and re-obtain said medical imaging. Said medical imaging is necessary for the additional expert opinions that Wal-Mart will disclose. As such, a brief extension is needed.

CURRENT DISCOVERY DEADLINES

Deadline for Wal-Mart to make expert disclosures:	6/15/17
Deadline to Plaintiff to make rebuttal expert disclosures:	7/15/17

[PROPOSED] NEW DISCOVERY DEADLINES

Deadline for Wal-Mart to make expert disclosures:	7/15/17
Deadline to Plaintiff to make rebuttal expert disclosures:	8/14/17

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2 DATED this 13th day of June, 2017

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4 RICHARD HARRIS LAW FIRM

5 /s/ Bryan Blackwell

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10 Attorneys for Plaintiff
11 Lucinda Craig

DATED this 13th day of June, 2017

PHILLIPS, SPALLAS & ANGSTADT LLC

/s/ Ryan Kerbow

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Wal-Mart Stores, Inc.

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13 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

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17 DATED: June 14, 2017
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